U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re the Matter of: UNDERDOG TRUCKING, L.L.C. AND REGGIE ANDERS, Plaintiff, VS. VERIZON COMMUNICATIONS, INC., CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS, REVEREND AL SHARPTON, NATIONAL ACTION NETWORK, AND DOES 1 THROUGH 9, Defendants.	Case No. 1:16-CV-05654-VSB **AFFIDAFIT OF DAVID L. WADE**

I, David L. Wade, hereby solemnly swear and state the following:

1. In the month of July, I was contacted by my member, Reggie Anders, regarding a law suit of discrimination by Verizon Communications, Inc. against Underdog Trucking, LLC. that had taken place in 2013.
2. Reggie asked if I could help to bring light to the injustice that was initiated against Underdog Trucking, LLC., by Verizon Communications, Inc.
3. After contacting my attorney, Benjamin Taylor, Attorney Taylor agreed to support Reggie and assist him regarding this legal matter. Attorney Taylor, Mr. Anders, and I met and we agreed the course of action would be to send Verizon

Communications, Inc., a demand letter with the expressed purpose of bringing both parties, Underdog Trucking, LLC. and Verizon Communications, Inc., to the table for a possible reconciliation.

4. It was Mr. Anders' desire to continue his relationship with Verizon Communications, LLC.
5. In the event that the demand letter and subsequent meeting was unsuccessful, the next step would be to reach out to several pastors across the country to encourage church membership to boycott of Verizon Communication, Inc. based upon their discriminatory practices of Mr. Anders. Unfortunately, no agreement was reached.
6. Subsequently, in the middle of July, I was involved in the planning of and arrangements for a meeting with Reverend Al Sharpton, President of the National Action Network, through the chairman, Dr. W. Franklyn Richardson.
7. We agreed to meet in New York, on or about August 28, 2014.
8. The meeting date, location, and time was set up through the office staff of the National Action Network and communicated to both Reggie and myself.
9. The meeting was held at the headquarters of the National Action Network at 10:00 am. In that meeting, Reverend Al Sharpton agreed to meet with executives of Verizon Communications, Inc., in exchange for $16,000 cash.
10. Reverend Sharpton stated that cash was the only acceptable form of payment. I was the person who placed the $16,000 in the hands of Reverend Al Sharpton.
11. The discussion that Reverend Al Sharpton was to have with Verizon was that of the injustice of my member, Reggie Anders with Verizon Communications, Inc. especially since Mr. Anders was not given his day in court.

12. Reverend Sharpton said, "these are the kind of cases that the National Action Network likes to handle." Reverend Al Sharpton stated he would do everything within his power to bring to light the mistreatment of my member, Reggie Anders. Reverend Al Sharpton further conveyed he would use his radio broadcast, his MSNBC television show, and even launching protest against Verizon Communications, Inc., to show my member Reggie was treated.

13. After the initial meeting, we were to hear back from Reverend Sharpton, or his attorney, Mike Hardy, for directions.

14. After a month or so, no information had been communicated to me and Reggie told me he had not received any information either. Reggie, being concerned, asked if we could make a phone call to the office of Reverend Al Sharpton at National Action Network.

15. When we called the National Action Network, we were told that Reverend Sharpton met with one of the Vice Presidents of Verizon and a forthcoming meeting would be set up.

16. Again, several weeks passed and no communication was received from Al Sharpton or Attorney Mike Hardy. We were both told that Reverend Sharpton had been in communication with someone from the executive staff of Verizon, yet no concrete proof had ever been extended to me, and Reggie told me he never received any proof either.

17. I spoke directly to Reverend Sharpton and to Mike Hardy, yet it seemed as though it was just verbiage without any action. It was as if they were just telling me what they believed Reggie and I wanted to hear.

18. Around December 15, 2014, Reggie was concerned about an article in the newspaper that suggested that there could be a possibility of a conflict of interest seeing that Reverend Sharpton received a large donation and Verizon Communications, LLC. is a sponsor of the National Action Network, where Reverend Al Sharpton it the president.

19. During the discussion, Al Sharpton, W. Franklyn Richardson, Mike Hardy, Reggie Anders, and myself were on a conference call. Reggie verbalized his concerns regarding the possibility of a conflict of interest. The tone of the conversation immediately shifted.

20. Reverend Sharpton insulted me in this conversation by addressing both me and my member as "cowards" and "punks." I, in turn, corrected Mr. Sharpton with some strong language.

21. I shared with Reverend Sharpton and the other parties that were on the line that my member had the right to ask any questions regarding any relationship with Verizon Communications, LLC. as it appeared as if the donations given to the National Action Network and Reverend Al Sharpton was in fact "hush money" to keep quiet regarding Verizon's discriminatory practices.

22. When Reggie raised his second concern by asking Reverend Sharpton to give concrete information regarding names of the people to whom he had been meeting with, there was no response. Reverend Sharpton responded by saying, "it's the holiday season, we will follow up and do whatever it takes to make this right."

23. After the holiday season, from January to this day, there has never been any paper trail or documentation of a conference call or other communication that occurred to justify the $16,000 that was paid to Reverend Sharpton for his help.

24. On several occasions, Reverend Sharpton assured my member that he was working hard at meeting with the executive staff of Verizon Communications, Inc. by telling us to be prepared to meet with the executive of Verizon Communications, Inc. with limited notice.

25. Reverend Al Sharpton stated he was working diligently with someone in the procurement division and assured Reggie that he was on top of it. But all it was verbiage as nothing never materialized.

26. Soon Reggie called me and stated, "Pastor, I am tired of being strung along. We need to look at the fact that nothing has been done."

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AFFIDAFIT OF DAVID L. WADE

27. To know that Al Sharpton's silence gave the appearance that he took my members money knowing that he and Verizon Communications, Inc. already had a partnership and it was a conflict of interest. Al Sharpton was not a man of his word.

OATH AND AFFIRMATION

I, David L. Wade, being duly sworn and under oath, state that I have read the legal document before its submission and all the statements contained herein are true and complete to the best of my knowledge and belief.

1/6/17 Signature: [signature]
Date DAVID L. WADE

STATE OF ARIZONA)
)ss.
County of Maricopa)

SUBSCRIBED AND SWORN before me this 6th day of January, 2017 by DAVID L. WADE.

My Commission Expires: Nov 4 2019

[signature]
Notary Signature

OFFICIAL SEAL
VICKY JUAREZ
Notary Public - State of Arizona
MARICOPA COUNTY
My Comm. Expires Nov. 4, 2019